

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff

Declaration of  
Aaron Ward

-against-

Civil Action No.  
CV-00-7073

UNITED STATES CURRENCY IN THE  
AMOUNT OF FIVE HUNDRED NINETY-  
EIGHTTHOUSAND EIGHT HUNDRED  
TWENTY-SIX DOLLARS MORE OR LESS, AND  
ALL PROCEEDS TRACEABLE THERETO,  
Defendants.

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(Irizarry, J.)  
(Pohorelsky, M.J.)

Aaron Ward hereby declares the following under the penalties of  
perjury pursuant to 28 USC 1746:

1. I am an attorney duly admitted to practice in the courts of the State of New York, as well as the Eastern District of New York. I work for Joseph Carbonaro, attorney for Edison Cardona. In that capacity, I am responsible for the prosecution of Claimant Edison Cardona's claim in this action. The information contained in this declaration is based upon personal knowledge, my review of the files and records of this action, and the materials produced during the course of this action.

2. This declaration is respectfully submitted in support of our Opposition to Plaintiff's Motion for Summary Judgment.

3. Annexed hereto as Exhibit 1 through 4 are Plaintiff's First and Second Interrogatories followed by the corresponding response by Claimant.

4. Annexed hereto as Exhibit 5 is Claimant's Answer to Plaintiff's Verified Complaint in Rem.

5. Annexed hereto as Exhibit 6 are picture of Mr. Cardona's residence. The stairs leading down in the front of the building go to Mr. Cardona's residence.

6. Annexed hereto as Exhibit 7 are letters of reference for Mr. Cardona and his father, Nasmy from individuals in the printing/graphic arts field (except the last) with the number of years they have known them and their business cards appended to the document.

8. Annexed hereto as Exhibit 8 is a copy of the bank records produced by Mr. Potas in support of Mr. Edison's claims.

9. Annexed hereto as Exhibit 9, and 10 are Claimants Notice of Motion for Return of Property Seized, and Magistrate Pohorelsky's Report and Recommendation which was subsequently adopted by the Court, respectively.

10. Annexed hereto as Exhibit 11 the Affirmation of Edison Cardona.

11. Annexed hereto as Exhibit 12 is Claimant Edison Cardona's Reply Memorandum of Law from 2001.

12. The Court is respectfully directed to the Declaration of Laura Mantel for complete copies of Mr. Cardona's deposition.

I declare that the foregoing statements are true and correct under penalty of perjury.

Dated: Queens, New York  
September 26, 2005

/s/ \_\_\_\_\_ Aaron Ward